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Attorneys for Plaintiffs

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**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

CHRISTIAN LOVGREN and GINA  
CUENO, individuals, on behalf of  
themselves, and on behalf of all persons  
similarly situated,

Plaintiffs,

v.

ENLOE MEDICAL CENTER, a  
California; and Does 1 through 50,  
Inclusive,

Defendants.

Case No. 2:24-cv-01134-WBS-DMC

**JOINT STIPULATION TO SET  
BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION TO  
REMAND CASE TO STATE COURT  
AND TO STAY CASE PENDING  
MEDIATION**

Judge: Hon. William B. Shubb  
Courtroom: 5, 14<sup>th</sup> Floor

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Attorneys for Defendant

1 Plaintiffs CHRISTIAN LOVGREN and GINA CUNEO (“Plaintiffs”) and  
2 Defendant ENLOE MEDICAL CENTER (“Defendant”) (collectively the “Parties”),  
3 by and through their respective counsel of record, hereby stipulate and agree as  
4 follows:

5 WHEREAS, on May 16, 2024, Plaintiffs filed and served their Notice of  
6 Motion and Motion to Remand Case to State Court, which is set for hearing on June  
7 24, 2024 (Dkt. 14);

8 WHEREAS, the Parties have agreed to participate in private mediation on  
9 January 21, 2025, with experienced wage and hour mediator Steven Serratore,  
10 which was his first available date that was mutually agreeable for the Parties;

11 WHEREAS, to prevent the Parties from incurring further, potentially  
12 unnecessary litigation expenses, and in the interests of judicial economy and the  
13 conservation of Party resources, the Parties agree that good cause exists to stay this  
14 action until after the mediation set for January 21, 2025;

15 WHEREAS, if mediation is cancelled by one or more Parties, the Parties will  
16 promptly notify the Court of the cancellation, the stay shall be lifted, and  
17 Defendant’s Opposition to Plaintiffs’ Motion to Remand Case to State Court will be  
18 due thirty (30) days after cancellation, with Plaintiffs’ Reply to Defendant’s  
19 Opposition due two (2) weeks thereafter; and

20 WHEREAS, the Parties met and conferred regarding the setting of a briefing  
21 schedule for Plaintiffs’ Motion to Remand Case to State Court, and the Parties have  
22 agreed on the following briefing schedule:

- 23 • The hearing on Plaintiffs’ Motion to Remand Case to State Court to be  
24 continued from June 24, 2024, to March 24, 2025;
- 25 • Defendant’s opposition deadline to be continued to February 4, 2025; and
- 26 • Plaintiffs’ reply deadline to be continued to February 11, 2025.
- 27

1 NOW, THEREFORE, based upon the foregoing, the Parties, by and through  
2 their respective undersigned counsel of record, hereby stipulate and agree as  
3 follows:

4 1. The above recitals are an integral part of and provide the foundation for  
5 this stipulation;

6 2. This matter is stayed, including all deadlines associated therewith, until  
7 after the completion of the mediation in this case;

8 3. If mediation is cancelled by one or more Parties, the Parties will  
9 promptly notify the Court of the cancellation, the stay shall be lifted, and  
10 Defendant's Opposition to Plaintiffs' Motion to Remand Case to State Court will be  
11 due thirty (30) days after cancellation, with Plaintiffs' Reply to Defendant's  
12 Opposition due two (2) weeks thereafter; and

13 4. The briefing schedule for Plaintiffs' Motion to Remand Case to State  
14 Court is as follows:

15 a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be  
16 continued from June 24, 2024, to March 24, 2025;

17 b. Defendant's opposition deadline to be continued to February 4, 2025;  
18 and

19 c. Plaintiffs' reply deadline to be continued to February 11, 2025.

20 **IT IS SO STIPULATED.**

21 *[Signatures of Following Page]*  
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**LITTLER MENDELSON, P.C.**

Dated: May 29, 2024

By: /s/ Douglas L. Ropel

Barbara Blackburn

Douglas L. Ropel

Attorneys for Defendant

ENLOE MEDICAL CENTER

Dated: May 29, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

By: /s/ Trevor G. Moran

Jeffrey S. Herman

Sergio Julian Puche

Trevor G. Moran

Attorneys for Plaintiffs

CHRISTIAN LOVGREN and GINA CUNEO


**ORDER**

By stipulation of the Parties, and for good cause shown, the Court hereby Orders as follows:

1. This above-captioned action is stayed, including all deadlines associated therewith, until after the completion of the mediation in this case;
2. This matter is stayed, including all deadlines associated therewith, until after the completion of the mediation in this case;
3. The August 26, 2024 Scheduling Conference is **vacated**;
4. If mediation is cancelled by one or more Parties, the Parties will promptly notify the Court of the cancellation, the stay shall be lifted, and Defendant's Opposition to Plaintiffs' Motion to Remand Case to State Court will be due thirty (30) days after cancellation, with Plaintiffs' Reply to Defendant's Opposition due two (2) weeks thereafter; and
5. The briefing schedule for Plaintiffs' Motion to Remand Case to State Court is as follows:
  - a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be continued from June 24, 2024, to **March 31, 2025 at 1:30 p.m.**;
  - b. Defendant's opposition deadline to be continued to **February 4, 2025**; and
  - c. Plaintiffs' reply deadline to be continued to **February 11, 2025**.

**IT IS SO ORDERED.**

Dated: May 30, 2024

  
**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**